

EXHIBIT 1

Stephen Stern

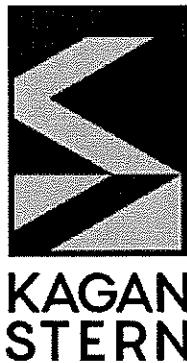
From: Stephen Stern
Sent: Wednesday, November 3, 2021 4:23 PM
To: Gregory Jordan
Cc: tgagliardo@gelawyer.com; Heather Yeung
Subject: Boshea v. Compass Marketing, Inc. - Depositions of David Boshea and John White

Follow Up Flag: Copied to Worldox (Client Files\210065\BL\00156652.MSG)

Greg:

Compass Marketing believes it is important to receive documents from and depose Daniel White (and Michael White) before it deposes Mr. Boshea. In light of the extensive interaction between Daniel (and Michael) White and Mr. Boshea, I do not think that should surprise you, as both Daniel and Michael should have a lot to say about matters that will arise in Mr. Boshea's deposition. With Daniel White (and Michael White) refusing to make themselves available for deposition any time soon, as well as refusing to produce any documents responsive to the subpoenas served on them, we will need to postpone Mr. Boshea's deposition and John White's deposition until after those depositions are completed. We still remain committed to what was agreed upon in principle earlier – that the depositions be conducted on back to back days in Chicago. We will circle back with you about finding mutually agreeable dates where John White and I will come out to Chicago for the depositions.

Stephen



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